

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION

2007 JUN 28 A 10: 27

KOCH FOODS OF ALABAMA, LLC,)
Plaintiff,)
U.S. DISTRICT COURT
MIDDLE DISTRICT ALA

v.)

GENERAL ELECTRIC CAPITAL)
CORPORATION)

Defendant.)

CASE NO: 2:07-cv-522

MOTION FOR ADMISSION *PRO HAC VICE*

COMES NOW, the undersigned, pursuant to Local Rule 83.1(b), and respectfully moves this Court for admission *pro hac vice* of Eugene J. Geekie, Jr. and Zhiyuan Xu in the above-styled case. As grounds for this motion, the undersigned shows as follows:

1. Eugene J. Geekie, Jr. and Zhiyuan Xu have been retained by the Plaintiff Koch Foods of Alabama LLC to represent it in connection with this action.

2. Mr. Geekie and Mr. Xu are attorneys at the firm of Schiff Hardin, LLP, 6600 Sears Tower, 233 South Wacker Drive, Chicago, Illinois 60606-6473, (312)258-5500 (telephone), (312)258-5600 (facsimile), egeekie@schiffhardin.com, and mxu@schiffhardin.com.

3. Mr. Geekie and Mr. Xu are qualified, admitted, and licensed to practice before the United States District Court for the Northern District of Illinois. Attached hereto are the Certificates of Good Standing for Mr. Geekie and Mr. Xu issued by that Court. Mr. Geekie and Mr. Xu have never been disciplined or otherwise disqualified from the practice of law nor has an application for their *pro hac vice* admission in a case been denied.

WHEREFORE, PREMISES CONSIDERED, the undersigned respectfully requests that Mr. Geekie and Mr. Xu be admitted to practice *pro hac vice* before this Court.

Respectfully submitted,


Thomas G. Mancuso
Attorney for Plaintiff Koch Foods
of Alabama LLC

OF COUNSEL:
Mancuso & Franco, P.C.
7515 Halcyon Summit Drive
Suite 301
Montgomery, Alabama 36117
Telephone: (334)481-1800
Facsimile: (334)481-1810

CERTIFICATE OF SERVICE


I hereby certify that a copy of the foregoing pleading has been served upon counsel of record addressed as follows:

Rusha C. Smith, Esq.
Bradley Arant Rose & White, LLP
One Federal Place
1819 Fifth Avenue North
Birmingham, Alabama 35203-2104

Alexander Terras, Esq.
Reed Smith Sachnoff & Weaver
10 South Wacker Drive
Chicago, Illinois 60606

Timothy Scott Harris, Esq.
Reed Smith Sachnoff & Weaver
10 South Wacker Drive
Chicago, Illinois 60606

by placing same in the United States mail, postage prepaid, on this the 28th day of June, 2007.


Of Counsel

AO82 SWEDA
(Rev. 4/91)TRIPLICATE
RECEIPT FOR PAYMENT
UNITED STATES DISTRICT COURT
for the

0611

MIDDLE DISTRICT OF ALABAMA

at MONTGOMERY

Fund	
6855XX	Deposit Funds
604700	Registry Funds
	General and Special Funds
508800	Immigration Fees
085000	Attorney Admission Fees
086900	Filing Fees
322340	Sale of Publication
322350	Copy Fees
322360	Miscellaneous
143500	Interest
322380	Recoveries of Court Costs
322386	Restitution of U.S. Government
121000	Conscience Fund
129900	Gifts
504100	Crime Victims Fund
613300	Unclaimed Monies
510000	Filings Spec. Acct.
510100	Registry Admin. Acct.

0001090

COURT COSTS

20 20.00

6855XX 40.00

HW

TOTAL 40.00

CHECK 40.00

CHANGE 0.00

2 ITM-CT

06/28/07

1304964000 09127

CASE REFERENCE:

2:07CV522-T

RECEIVED FROM

Manvuso & Franco7515 Halapen Summit Dr.Montg. AL 36117PHV - Eugene J. Beckie Jr.PHV - Zhiyuan XuDEPUTY CLERK PR

Checks and drafts are accepted subject to collection and full credit will only be given when the check or draft has been accepted by the financial institution on which it was drawn.

THIS IS A RECEIPT, NOT A BILL

CERTIFICATE OF GOOD STANDING



United States of America

}ss. Eugene J. Geekie Jr.

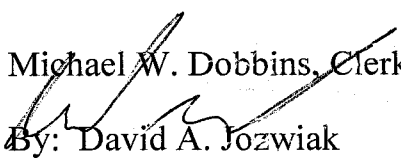
Northern District of Illinois

I, Michael W. Dobbins, Clerk of the United States District Court
for the Northern District of Illinois,

DO HEREBY CERTIFY That Eugene J. Geekie Jr.
was duly admitted to practice in said Court on (12/08/1988)
and is in good standing as a member of the bar of said court.

Dated at Chicago, Illinois
on (06/20/2007)

Michael W. Dobbins, Clerk,

By: 
David A. Jozwiak
Deputy Clerk

CERTIFICATE OF GOOD STANDING



United States of America

} ss. Zhiyuan Xu

Northern District of Illinois

I, Michael W. Dobbins, Clerk of the United States District Court
for the Northern District of Illinois,

DO HEREBY CERTIFY That Zhiyuan Xu
was duly admitted to practice in said Court on (06/21/2007)
and is in good standing as a member of the bar of said court.

Dated at Chicago, Illinois
on (06/22/2007)

Michael W. Dobbins, Clerk,

By: Krysten J. Coppoletta
Deputy Clerk